

Exhibit _ (KRK-3A)

**Originally Filed As Exhibit No. _ (KRK-2) to the
Direct Testimony of
Kevin R. Kochems
on Behalf of
South Carolina Electric & Gas Company in
Docket No. 2017-370-E**

**THE OFFICE OF REGULATORY STAFF
SETTLEMENT TESTIMONY & EXHIBIT**

OF

M. ANTHONY JAMES, P.E.

JUNE 29, 2015



DOCKET NO 2015-103-E

Summary

Petition of South Carolina Electric & Gas Company for Updates and Revisions to the Capital Cost Schedule and Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina

1 Program Manager in the Bureau of Water, I was responsible for coordinating DHEC's
2 statewide wastewater compliance efforts. In 2004, I joined the ORS Electric Department
3 as a Senior Electric Specialist and was later promoted to Associate Program Manager.
4 As a member of the Electric Department my responsibilities focused on testifying on
5 various filings by investor-owned utilities, serving as the lead contact for renewable
6 energy activities and implementing management objectives. In 2012, I was promoted to
7 Deputy Director of the Electric and Natural Gas Division. As Deputy Director, my
8 responsibilities grew to include providing general oversight of all activities of the Electric
9 Department as well as the Natural Gas Department and supporting senior management
10 objectives. In 2014, I was promoted to Director of New Nuclear Development to provide
11 oversight of the nuclear construction projects in South Carolina. Collectively, I have
12 more than twenty-five years of experience as an environmental engineer in regulatory
13 compliance.

14 **Q. HAVE YOU TESTIFIED BEFORE THE PUBLIC SERVICE COMMISSION OF**
15 **SOUTH CAROLINA ("COMMISSION")?**

16 **A.** Yes. I have testified before the Commission in general base rate cases, a number
17 of fuel clause proceedings, and a previous proceeding to update the schedule and budget
18 for the construction of the new nuclear units in Jenkinsville, SC. I have also been an
19 ORS witness in proceedings regarding renewable energy resources, specifically, net
20 metering programs and smart grid standards. I have also provided updates to the
21 Commission via allowable ex parte briefings.

22 **Q. WHAT IS THE PURPOSE OF YOUR SETTLEMENT TESTIMONY IN THIS**
23 **PROCEEDING?**

1 A. The purpose of my settlement testimony is to provide an overview of the South
2 Carolina Electric & Gas Company's (the "Company" or "SCE&G") petition for updates
3 and revisions to the capital cost schedule and schedules related to the construction of a
4 nuclear base load generation facility at Jenkinsville, South Carolina ("Petition"). I
5 summarize ORS's findings regarding SCE&G's Petition and the major components of the
6 settlement agreement ("Settlement") which ORS supports. Lastly, I discuss ORS's
7 regulatory oversight activities with regard to the construction of V.C. Summer Nuclear
8 Station AP1000 Units 2 & 3 (the "Units").

9 **Q. WHAT IS SCE&G REQUESTING IN ITS PETITION?**

10 A. Under S.C. Code Ann. § 58-33-270(E)(1) of the Base Load Review Act
11 ("BLRA"), SCE&G is requesting the Commission to modify the construction schedule to
12 reflect new substantial completion dates ("SCDs") of June 19, 2019 and June 16, 2020
13 for Unit 2 and Unit 3, respectively. SCE&G is also requesting an increase to the capital
14 cost estimates by approximately \$698 million (2007 dollars). See Exhibit MAJ-1. The
15 \$698 million is composed of approximately \$453 million in Engineering, Procurement
16 and Construction Contract ("EPC Contract") Costs and \$245 million in Owner's Costs.
17 Of the \$698 million request, \$325 million (which is net of \$86 million in liquidated
18 damages) in EPC Contract Costs and \$214 million in owner's costs are attributed to delay
19 and disputed costs which are discussed further below.

20 **Q. WHAT AUTHORITY GUIDES ORS'S REVIEW OF THE PETITION?**

21 A. ORS is guided by the same statute that permits the BLRA modification request,
22 S.C. Code Ann. § 58-33-270(E)(1). It states, "The commission shall grant the relief
23 requested, if after a hearing, the commission finds as to the changes in the schedules,

1 estimates, findings, or conditions, that the evidence of record justifies a finding that the
2 changes are not the result of imprudence on the part of the utility...." Using this statute,
3 ORS reviews the Company's request to determine if there has been any imprudence on
4 the part of the utility.

5 **Q. IN REVIEWING THE PETITION AND SUPPORTING DOCUMENTATION, DID**
6 **ORS FIND THAT SCE&G ACTED IMPRUDENTLY?**

7 **A.** No, ORS did not. ORS finds that the changes presented in the Petition are not the
8 result of imprudence on the part of the Company; and therefore, in accordance with the
9 BLRA, SCE&G should be granted the relief requested.

10 **Q. PLEASE DESCRIBE ORS'S ACTIVITIES IN RESPONSE TO SCE&G'S**
11 **PETITION.**

12 **A.** ORS issued numerous requests for information and reviewed an enormous
13 amount of data to evaluate the Company's Petition. ORS met frequently with
14 representatives from SCE&G's construction, business and finance departments to discuss
15 the details of the Petition and the supporting information. ORS also interviewed several
16 Company technical experts to fully understand the particulars related to various
17 components of the Petition.

18 **Q. PLEASE DISCUSS SCE&G'S REQUEST TO MODIFY THE APPROVED**
19 **CONSTRUCTION SCHEDULE.**

20 **A.** In August 2014, SCE&G received a preliminary revised construction schedule
21 from Westinghouse Electric Company and Chicago Bridge & Iron (the "Consortium")
22 which shows the Unit 2 SCD to be delayed until late 2018 or the first half of 2019, and
23 the Unit 3 SCD date to be delayed by approximately one year, thereafter.

1 SCE&G's Petition includes a revised construction schedule ("Revised Schedule")
2 which shows new SCDs of June 19, 2019 and June 16, 2020 for Unit 2 and Unit 3,
3 respectively. SCE&G refers to this schedule in its Petition as the revised, fully-integrated
4 schedule. SCE&G reported to ORS that the Consortium continues to experience delays
5 in fabrication and delivery of submodules for the Units and that these delays are the
6 primary reason for the Revised Schedule.

7 **Q. HAS SCE&G AGREED TO MODIFY THE GUARANTEED SUBSTANTIAL**
8 **COMPLETION DATES IN THE EPC CONTRACT?**

9 **A.** No. SCE&G's rights to liquidated damages from the Consortium are based on the
10 guaranteed SCDs contained in the EPC Contract. The EPC Contract states that
11 guaranteed SCDs can only be revised via a change order. In Docket No. 2012-203-E,
12 SCE&G presented an agreement signed by the Company and the Consortium which
13 became the basis for Change Order #16. The Commission approved the agreement in
14 Order No. 2012-884 resulting in a revised schedule that included new SCDs which would
15 match the guaranteed SCDs in the EPC Contract.

16 In this case, SCE&G has not agreed to a change order or an agreement supporting
17 revised guaranteed SCDs. Consequently, should the Commission decide to approve the
18 Company's request, the EPC Contract will retain the guaranteed SCDs of March 15, 2017
19 and May 15, 2018 for Unit 2 and Unit 3, respectively, as approved in Order No. 2012-
20 884. However, as set forth in the Revised Schedule, the project would proceed toward
21 the new SCDs of June 19, 2019 and June 16, 2020 for Unit 2 and Unit 3, respectively. If
22 these new SCDs are approved, the guaranteed SCDs in the EPC Contract would be

1 different from SCDs in the Commission's order. The tables below show the history of
2 the SCDs for the Units.

3 **Substantial Completion Dates**

4 **Unit 2:**

Order No. 2009-104(A)	Order No. 2012-884	Docket 2015-103-E
4/1/2016	3/15/2017	6/19/2019

5 **Unit 3:**

Order No. 2009-104(A)	Order No. 2012-884	Docket 2015-103-E
1/1/2019	5/15/2018	6/16/2020

6
7 **Q. DOES THE DIFFERENCE IN GUARANTEED SCDs IN THE EPC CONTRACT**
8 **AND THE SCDs PRESENTED FOR APPROVAL UNDER THE BLRA IN THIS**
9 **PETITION CREATE A CONCERN FOR ORS?**

10 **A.** No. Although the new SCDs will not have the dual-binding impact of the
11 Commission order and the EPC Contract, the Commission orders, as always, will
12 continue to govern ORS's determination of SCE&G's ability to adhere to the approved
13 schedule.

14 **Q. HOW DO THE NEW SCDs RELATE TO THE FEDERAL PRODUCTION TAX**
15 **CREDITS?**

16 **A.** SCE&G is eligible to receive approximately \$2.2 billion (\$1.1 billion per unit) in
17 federal production tax credits if the Units are placed in service prior to January 1, 2021.
18 The new SCDs meet that date. However, the 18-month boundary currently approved by
19 the Commission in Order No. 2009-104(A) allows the SCD for Unit 3 to extend beyond
20 January 1, 2021.

1 **Q. PLEASE DISCUSS SCE&G'S REQUEST TO MODIFY THE CAPITAL COST**
2 **ESTIMATES.**

3 **A.** The Company is requesting to increase the base project cost by approximately
4 \$698 million (2007 dollars). See Exhibit MAJ-1 for a breakdown of costs in 2007
5 dollars. The gross construction cost of the Units will increase by approximately \$1.1
6 billion (future dollars).

7 **Base Project Cost (\$000)**

8 (2007 Dollars)

Order No. 2012-884	Docket 2015-103-E	Change
\$4,548,405	\$5,246,638	\$698,233

9 **Gross Construction Cost (\$000)**

10 (Future Dollars)

Order No. 2012-884	Docket 2015-103-E	Change
\$5,754,565	\$6,826,914	\$1,072,349

11
12 **Q. PLEASE PROVIDE A BREAKDOWN OF THE INCREASE IN THE BASE**
13 **PROJECT COST.**

14 **A.** The increase of approximately \$698 million can be represented by two major cost
15 categories, EPC Contract Costs totaling \$453 million and Owner's Costs totaling \$245
16 million.

17 **Q. PLEASE PROVIDE A BREAKDOWN OF THE EPC CONTRACT COSTS.**

18 **A.** With reference to Exhibit MAJ-1, the EPC Contract Cost is approximately \$453
19 million which consists of \$411 million in delay and other estimated at completion
20 ("EAC") costs (or \$325 million which is net of \$86 million in the projected recovery of
21 liquidated damages from the Consortium); \$72 million in design finalization costs; \$56.5

1 million in change order costs; and a reduction of \$107,000 for switchyard re-allocation of
2 costs.

3 **Q. WHAT CHANGE ORDERS ARE IN THE PETITION?**

4 **A.** The Petition includes the following 10 change orders totaling approximately
5 \$56.5 million:

6 **Change Orders (\$000)**

1 Plant Layout Security	\$	20,350
2 Cyber Security Upgrades		18,816
3 Schedule Mitigation for Shield Building Panels		12,100
4 Federal Health Care Act (CO #20)		2,182
5 Plant Reference Simulator & S/W (CO #19)		1,100
6 Ovation and Common Q I&C Training Sys.		880
7 Simulator Development System		605
8 ITAAC Maintenance (CO #21)		372
9 Warehouse Fire Security		121
10 Perch Guards (CO #18)		14
Total Costs Due to Change Orders	\$	56,540

7
8
9 **Q. DOES ORS HAVE A RECOMMENDATION REGARDING THE CHANGE**
10 **ORDERS?**

11 **A.** Yes, given that several change orders are being negotiated, ORS recommends the
12 Company track and report final change order costs in its quarterly reports filed with the
13 Commission.

14 **Q. PLEASE DISCUSS THE OWNER'S COSTS.**

15 **A.** With reference to Exhibit MAJ-1, the Owner's Costs increase of approximately
16 \$245 million includes \$214 million in owner's costs associated with the delay and \$31
17 million in owner's costs not associated with the delay.

1 **Q. PLEASE ELABORATE ON OWNER'S COSTS ASSOCIATED WITH THE**
2 **DELAY.**

3 **A.** Owner's costs associated with the delay is approximately \$214 million which
4 consists of \$125 million in owner's labor cost revisions; \$30 million in owner's risk
5 insurance and workers compensation insurance; \$6.5 million in additional information
6 technology ("IT") costs; \$6 million in facilities cost increases; and \$46 million in other
7 costs.

8 **Q. PLEASE ELABORATE ON OWNER'S COSTS NOT ASSOCIATED WITH THE**
9 **DELAY.**

10 **A.** Owner's costs not associated with the delay is approximately \$31 million which
11 consists of \$7.5 million for 64 additional employees; \$7 million in Nuclear Regulatory
12 Commission ("NRC") fees; \$3.3 million in other IT costs; and \$12.8 million in other
13 costs.

14 **Q. HOW MUCH OF THE PETITION'S TOTAL INCREASE IS RELATED TO**
15 **DELAY AND OTHER DISPUTED COST?**

16 **A.** Approximately \$539 million (or 77%) of the \$698 million increase is related to
17 delay and other disputed costs which includes \$411 million in delay and other EAC costs
18 (or \$325 million which is net of \$86 million in projected recovery of liquidated damages
19 from the Consortium), and \$214 million in owner's costs associated with the delay.

20 **Q. DOES ORS HAVE ANY FINDINGS OR RECOMMENDATIONS?**

21 **A.** Yes. ORS evaluated the Petition with regard to its statutory responsibility to
22 represent the public interest by balancing the (1) concerns of the using and consuming
23 public; (2) economic development and job attraction and retention in South Carolina; and

1 (3) preservation of the financial integrity of the state's public utilities. ORS also
2 evaluated the Petition with regard to Section 58-33-270(E) of the BLRA which states:

3 "The commission shall grant the relief requested if, after a hearing, the
4 commission finds:

5 (1) as to the changes in the schedules, estimates, findings, or
6 conditions, that the evidence of record justifies a finding that
7 the changes are not the result of imprudence on the part of the
8 utility..."

9 ORS met frequently with representatives from SCE&G's construction, business
10 and finance departments to discuss the methodology used to produce the estimates in the
11 Petition. While the Company's owner's costs estimates are well supported, the EAC cost
12 estimates provided by the Consortium, and adjusted by the Company, do not reflect the
13 same level of detail as compared to the owner's costs estimates. Nevertheless, based on
14 ORS's review; SCE&G's in-depth evaluation; and, SCE&G's adoption of the proposed
15 schedule and budget, ORS finds the cost estimates to have sufficient support and provide
16 a reasonable basis to proceed with the Units.

17 As ORS considers its statutory responsibility to represent the public interest in the
18 context of the requirements of Section 58-33-270(E)(1) of the BLRA, ORS finds that the
19 changes presented in the Petition are not the result of imprudence on the part of the
20 Company; and therefore, in accordance with the BLRA, SCE&G should be granted the
21 relief requested.

22 **Q. WHO ARE THE PARTIES TO THE SETTLEMENT?**

1 A. ORS, SCE&G, and the South Carolina Energy Users Committee (collectively, the
2 "Settling Parties" or the "Parties") filed the Settlement with the Commission on June 29,
3 2015. There are two other intervening parties in this docket: CMC Steel South Carolina
4 and the Sierra Club.

5 **Q. WHAT ARE THE MAJOR COMPONENTS OF THE SETTLEMENT?**

6 A. The Parties agree that the Revised Schedule and capital cost estimates presented
7 in the Petition are consistent with the BLRA and should be approved by the Commission.

8 The Parties also agree that beginning with any revised rates filing made on or
9 after January 1, 2016, and prospectively thereafter until such time as the Units are
10 completed, SCE&G will develop and calculate its revised rates filings using 10.5% as the
11 return on common equity rather than the approved return on common equity of 11%.

12 **Q. DOES ORS SUPPORT THE SETTLEMENT?**

13 A. Yes. ORS supports this Settlement and finds it to be in the public interest. With
14 the reduction of the return on equity from 11% to 10.5%, the total impact is estimated to
15 be approximately \$15 million in savings to ratepayers. ORS respectfully requests that the
16 Commission approve the Settlement.

17 **Q. WHAT ESTABLISHES ORS'S OVERSIGHT RESPONSIBILITIES?**

18 A. Section 58-33-277(B) of the BLRA states that "[t]he Office of Regulatory Staff
19 shall conduct on-going monitoring of the construction of the plant and expenditure of
20 capital through review and audit of the quarterly reports under this article, and shall have
21 the right to inspect the books and records regarding the plant and the physical progress of
22 construction upon reasonable notice to the utility."

23 **Q. WHAT ARE THE PRIMARY AREAS OF ORS'S OVERSIGHT ACTIVITIES?**

1 A. ORS monitors the Commission-approved construction schedule and cost
2 estimates. Section 58-33-275(A) of the BLRA states, "...capital costs are prudent utility
3 costs and expenses and are properly included in rates so long as the plant is constructed
4 or is being constructed within the parameters of: (1) the approved construction schedule
5 including contingencies; and (2) the approved capital costs estimates including specified
6 contingencies."

7 **Q. DESCRIBE ORS'S MONITORING OF THE APPROVED SCHEDULE.**

8 A. ORS visits the construction site in Jenkinsville at least twice per week to perform
9 on-site reviews of numerous documents that relate to the approved construction schedule.
10 These documents include, but are not limited to: the weekly construction activities report,
11 detailed construction schedules, milestone comparison activity report, milestone schedule
12 recovery plans, major component fabrication status log and meeting minutes. ORS also
13 attends on-site Plan of the Day meetings with "front-line" Project Managers to learn
14 about immediate construction activities and challenges. On a monthly basis, ORS and its
15 consultant meet with SCE&G's on-site lead project representatives to discuss the overall
16 status of the Units and perform an in-depth site tour to observe construction progress.

17 **Q. WHAT OTHER ACTIVITIES DOES ORS PERFORM AS PART OF ITS ON-
18 GOING CONSTRUCTION SCHEDULE MONITORING?**

19 A. In addition, ORS reviews the Company's required quarterly reports, which,
20 among other things, provide a status of the approved BLRA milestone schedule. The
21 BLRA milestone schedule consists of 146 milestone activities. ORS verifies the status of
22 each milestone activity to ensure the construction activity is in accordance with the

1 Commission's order. Milestone activities are allowed to be accelerated by up to 24
2 months or delayed by up to 18 months.

3 **Q. PLEASE DESCRIBE ORS'S MONITORING OF THE APPROVED CAPITAL**
4 **COST ESTIMATES.**

5 **A.** ORS compares the capital cost estimates approved by the Commission to the cost
6 estimates in the Company's quarterly reports. This comparison focuses on the 9 major
7 cost categories, which are:

- 8 1. Fixed with No Adjustment
- 9 2. Firm with Fixed Adjustment A
- 10 3. Firm with Fixed Adjustment B
- 11 4. Firm with Indexed Adjustment
- 12 5. Actual Craft Wages
- 13 6. Non-Labor Cost
- 14 7. Time & Materials
- 15 8. Owner's Costs
- 16 9. Transmission Projects

17 ORS evaluates cost variances which may be due to various project changes (e.g.,
18 shifts in work scopes, payment timetables, construction schedule adjustments, change
19 orders, etc.) to determine if the cumulative amount of these changes impact the total
20 approved capital cost of the project (in 2007 dollars).

21 In a similar fashion, ORS compares the approved project cash flow to the project
22 cash flow in the Company's quarterly reports. This comparison focuses on any impact to
23 annual cash flow requirements.

24 Lastly, allowance for funds used during construction and escalation rates are
25 evaluated to determine if appropriate rates have been applied.

1 **Q. WHAT OTHER ACTIVITIES DOES ORS PERFORM AS PART OF ITS ON-**
2 **GOING MONITORING OF THE APPROVED CAPITAL COST ESTIMATES?**

3 **A.** During on-site visits, ORS reviews documents that may impact the project budget.
4 Examples of such documents are contract amendments and change orders. ORS also
5 reviews invoices associated with completed milestone activities to ensure milestone
6 payments are consistent with the EPC Contract milestone payment schedules. In
7 addition, ORS's Audit Division further evaluates the Company's actual project
8 expenditures.

9 **Q. PLEASE ELABORATE ON ORS'S AUDIT DIVISION'S EVALUATIONS.**

10 **A.** ORS Audit Division personnel conduct regulatory audit procedures on the
11 Company's recorded project expenditures. ORS evaluates the Company's accounting
12 controls over project expenditures and, based on this evaluation, ORS determines the
13 extent to which these controls prevent improper payments.

14 **Q. DOES ORS EXAMINE EACH DISBURSEMENT TO ENSURE THAT THE**
15 **CONTROLS OVER DISBURSEMENTS ARE BEING PROPERLY APPLIED?**

16 **A.** No. In accordance with standard audit procedures, ORS examines a sample of
17 expenditures to ensure that the controls are being applied. These samples are selected
18 from the entire population of charges to the construction project account.

19 **Q. PLEASE DESCRIBE THE PROCEDURES PERFORMED TO ENSURE THAT**
20 **DISBURSEMENTS COMPLY WITH THE INTERNAL CONTROLS.**

21 **A.** For each disbursement selected, Audit staff examines vendor invoices to ensure:
22 invoices are from valid vendors; charges included are related to the project; the charges
23 are for the correct time period; invoices are mathematically correct; proper approval

1 signatures are evident on the invoice routing documents; accounts charged are consistent
2 with the nature of the disbursements; and items have been charged to the proper EPC
3 Contract cost category.

4 **Q. WHAT OTHER MONITORING ACTIVITIES DOES ORS PERFORM?**

5 **A.** ORS technical staff, as well as, senior and executive management, participate in
6 quarterly meetings with SCE&G's executive management. ORS meets quarterly with the
7 Consortium representatives, attends NRC public meetings held near the site, and
8 participates in NRC conference calls to monitor federal licensing activities. Additionally,
9 ORS traveled to fabrication facilities in South Carolina, Virginia, Louisiana, and Florida
10 to monitor the fabrication of major structural modules, shield building panels, mechanical
11 modules and components.

12 **Q. ARE THE RESULTS OF ORS'S OVERSIGHT ACTIVITIES AVAILABLE TO**
13 **THE PUBLIC?**

14 **A.** Yes. Subsequent to each quarterly report filed by SCE&G, ORS generates a
15 report which details ORS's review of the Company's quarterly report as well as other
16 notable activities related to the construction of the Units. ORS reports are non-
17 confidential and available at www.regulatorystaff.sc.gov. In addition to ORS's review of
18 SCE&G's quarterly reports, ORS responds to the Company's annual request for revised
19 rates. ORS examines SCE&G's annual revised rates filing which seeks rate recovery to
20 cover the financing of project expenditures. ORS reviews the request and issues a report
21 documenting its findings.

22 **Q. DOES THIS CONCLUDE YOUR SETTLEMENT TESTIMONY?**

23 **A.** Yes, it does.

SC Office of Regulatory Staff
SCE&G Petition to Modify the Approved Schedule and Budget
for VC Summer Units 2&3
Docket No. 2015-103-E

Revision to Capital Cost Estimates (\$000)
(2007 Dollars)

a. EPC Contract Costs	
i. Delay and Other EAC Costs	
Delay Costs and Other EAC Costs	\$ 410,328
Less "Liquidated Damages"	<u>(85,525)</u>
Net Delay and Other EAC Costs ^(a)	\$ 324,803
ii. Design Finalization Costs	
Costs Assoc. w/Final Design Finalization	<u>\$ 71,899</u>
Total Design Finalization Costs	\$ 71,899
iii. Costs Due to Change Orders:	
1 Plant Layout Security	\$ 20,350
2 Cyber Security Upgrades	18,816
3 Schedule Mitigation for Shield Building Panels	12,100
4 Federal Health Care Act (CO #20)	2,182
5 Plant Reference Simulator & S/W (CO #19)	1,100
6 Ovation and Common QI&C Training Sys.	880
7 Simulator Development System	605
8 ITAAC Maintenance (CO #21)	372
9 Warehouse Fire Security	121
10 Perch Guards (CO #18)	<u>14</u>
Total Costs Due to Change Orders	\$ 56,540
iv. Switchyard Cost Re-allocation	\$ (107)
Total EPC Contract Costs	\$ 453,136
b. Owner's Cost Revisions Associated w/Delay	
i. Owner's Labor Cost Revisions	\$ 125,279
ii. Owner's Risk Insurance & Workers Comp.	30,101
iii. Additional IT Costs	6,504
iv. Facilities Cost Increases	6,071
v. Other Owner's Costs	<u>46,351</u>
Total Owner's Cost Assoc. w/Delay ^(b)	\$ 214,307
c. Owner's Cost Increases Not Assoc. w/Delay	
i. Additional 64 Employees	\$ 7,535
ii. NRC Fees	7,094
iii. Other IT Costs	3,309
iv. Other Costs	<u>12,851</u>
Total Owner's Cost Increases Not Assoc. w/Delay	\$ 30,789
Total Owner's Cost Increase	\$ 245,096
Total Delay and Disputed Costs ^{(c)(d)}	\$ 539,110
Total Revision to Cost Forecast	\$ 698,233

Note: Totals may not add due to rounding